

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

NETJETS ASSOCIATION OF SHARED  
AIRCRAFT PILOTS,

Plaintiff,

vs.

NETJETS AVIATION, INC., et al.

Defendant.

Case No.: 2:14-cv-02487

Judge Watson

Magistrate Judge King

**JOINT MOTION FOR ENTRY OF AGREED ORDER ESTABLISHING PROTOCOL  
FOR PRODUCTION OF ELECTRONICALLY STORED INFORMATION**

Fed. R. Civ. P. 26(f)(3)(C) required the parties during their Rule 26(f) conference to discuss issues about disclosure or discovery of electronically stored information, including the form or forms in which it should be produced. Following their Rule 26(f) conference, the parties met and conferred to outline a protocol for production of electronically stored information in this matter. The results of that negotiation were memorialized in the attached Agreed Order Establishing Protocol for Production of Electronically Stored Information. This Order will enable discovery to proceed more smoothly and more efficiently, and will eliminate uncertainty in the expectations of the parties concerning production of electronically stored information.

Accordingly, and pursuant to Rule 26, the parties jointly request the Court enter the attached Agreed Order Establishing Protocol for Production of Electronically Stored Information.

Respectfully submitted,

*s/Jennifer E. Edwards*

Jennifer E. Edwards (0079220)  
*Trial Attorney*  
Ronald G. Linville (0025803)  
Robert M. Kincaid, Jr. (0017929)  
Jacqueline K. Matthews (0086259)  
Andrew E. Samuels (0090189)  
BAKER & HOSTETLER LLP  
Capitol Square, Suite 2100  
65 East State Street  
Columbus, OH 43215-4260  
Telephone: 614.228.1541  
Facsimile: 614.462.2616  
Email: jedwards@bakerlaw.com  
rlinville@bakerlaw.com  
rkincaid@bakerlaw.com  
jmatthews@bakerlaw.com  
asamuels@bakerlaw.com

John B. Lewis (0013156)  
BAKER & HOSTETLER LLP  
PNC Center  
1900 East 9th Street, Suite 3200  
Cleveland, OH 44114-3482  
Telephone: 216.621.0200  
Facsimile: 216.696.0740  
Email: jlewis@bakerlaw.com

*Attorneys for Defendants*

*NetJets Aviation, Inc. and NetJets Inc.*

*s/James Petroff per email authorization*

James Petroff (0042476)  
*Trial Attorney*  
Trent Taylor (0091748)  
BARKAN & MEIZLISH, LLP  
250 East Broad Street, 1 Oth Floor  
Columbus, Ohio 43215  
PH: 614-221-4221; FAX 614-744-2300  
jpetroff@barkanmeizlish.com  
ttaylor@barkanmeizlish.com

Karl S. Kronenberger (Ohio Reg. 006807)  
KRONENBERGER ROSENFELD, LLP  
150 Post Street, Suite 520  
San Francisco, CA 94108-4707  
T: (415) 955-1155 ext. 114  
F: (415) 955-1158  
karl@KRinternetlaw.com

*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing was filed electronically with the Clerk of Court using the CM/ECF system and to be thereby served electronically upon the following counsel of record this 21st day of April, 2015:

James Petroff  
Barkan Meizlish, LLP  
250 East Broad Street, 10<sup>th</sup> Floor  
Columbus, Ohio 43215  
[jpetroff@barkanmeizlish.com](mailto:jpetroff@barkanmeizlish.com)

Trent R. Taylor  
Barkan Meizlish Handelman Goodin DeRose Wentz, LLP  
250 East Broad Street, 10<sup>th</sup> Floor  
Columbus, Ohio 43215  
[ttaylor@barkanmeizlish.com](mailto:ttaylor@barkanmeizlish.com)

Karl Stephen Kronenberger  
Kronenberger Rosenfeld, LLP  
150 Post Street, Suite 520  
San Francisco, CA 94108  
[karl@krinternetlaw.com](mailto:karl@krinternetlaw.com)

*/s/ Jennifer E. Edwards*  
\_\_\_\_\_  
Trial Attorney for Defendants  
NetJets Aviation, Inc. and NetJets Inc.